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8 *Attorneys for Mark D. Waldron, Chapter 11 Trustee*

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

Chapter 11

**MOTION TO ADMIT ATTORNEY
MARC J. PHILLIPS *PRO HAC VICE*
UNDER LOCAL CIVIL RULE
83.2(c)(3)**

[No Hearing Requested]

Attorney Paul H. Beattie of CKR Law LLP respectfully moves this
honorable Court under Eastern District of Washington LBR 9010-1 and Eastern
District L. Civ. R. 83.2(c) for an Order granting the *Pro Hac Vice* admission of
Marc J. Phillips (“Applicant”), who is Mr. Beattie’s partner at CKR Law LLP.

BACKGROUND

The Chapter 11 Trustee, Mark D. Waldron, has retained CKR Law LLP as
his general bankruptcy counsel. Applicant Phillips is a member in good standing
of the State Bar of Delaware. As set forth below, Applicant’s law partner, Paul H.

1 Beattie, is a member of the Washington State Bar and is admitted to practice
2 before the United States District Court for the Eastern District of Washington
3 (where he has practiced for many years) and before this honorable Court.

4 **LOCAL CIVIL RULE 83.2(c)(4) COMPLIANCE**

5 Movant and Applicant submit the following information as required by
6 Eastern District L. Civ. R. 83.2(c)(4). The information is confirmed and attested
7 to in the accompanying Declaration of Marc J. Phillips, Attorney.
8

9 **A. Applicant's Address and Telephone Number.**

10 Marc J. Phillips, Attorney
11 CKR Law LLP
1000 N. West Street, Suite 1200
12 Wilmington, Delaware 19801
T: (302) 367-7834
13 E: mphilips@ckrlaw.com

14 **B. Dates of Admission to Practice Before Other Courts.**

15 2003: Admitted to Delaware Bar
U.S. District Court for the District of Delaware

16
17 2004: Admitted to United States Court of Appeals for the Third
Circuit

18 **C. Name, Address and Telephone Number of Admitted Counsel**
19 **With Whom the Applicant Will Be Associated.**

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1 **D. Necessity for Appearance by Applicant**

2 The Chapter 11 Trustee has finalized agreements with three of the Debtor's
3 landlords, subject to Court approval. It is imperative that the Chapter 11 Trustee
4 submit these agreements to the Court for approval as soon as possible. Mr.
5 Phillips is an experienced bankruptcy who can significantly assist in preparing the
6 necessary motions and later in the case in negotiating and formulating a plan of
7 reorganization. Mr. Phillips is also an experienced bankruptcy litigator, which is
8 important in this case given the indicia of fraud that are present.

9 As set forth in the Phillips Declaration, Applicant, a graduate of Virginia
10 Military Institute and Widener University Law School, is an experienced Chapter
11 11 bankruptcy practitioner who has sixteen years of experience in bankruptcy
12 litigation and insolvency matters – all directly relevant to this case. Importantly,
13 CKR Law LLP has one of the largest and most experienced blockchain practice
14 groups in the United States: their knowledge and experience, tapped into and
15 deployed by Mr. Phillips, will allow the Chapter 11 Trustee to properly discharge
16 his responsibilities in this factually and legally complex Chapter 11 proceeding.

17 **E. Disciplinary Sanctions by Any Court or Bar Association.**

18 Applicant has never been disciplined or sanctioned by any court or bar
19 association.

1 **CONCLUSION**

2 WHEREFORE, the duly-appointed Chapter 11 Trustee, through Attorney
3 Paul Beattie, respectfully requests that the Court enter an Order:

- 4 1. Granting the Application in its entirety;
- 5 2. Allowing Applicant Phillips to participate in this case on a *pro hac*
6 *vice* basis; and
- 7 3. Granting any further relief the Court deems to be appropriate and
8 just.

9 Dated: March 22, 2019

CKR LAW LLP

10 By: /s/ Paul H. Beattie
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15 *Attorneys for Mark D. Waldron, Chapter 11*
16 *Trustee*